



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: August 13, 2012

RE: DuBose Strapping, Inc. / 107-31044-00063

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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**New Source Review and Minor Source Operating
Permit Renewal
OFFICE OF AIR QUALITY**

**DuBose Strapping, Inc.
4414 E 400 South
Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M107-31044-00063	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 13, 2012 Expiration Date: August 13, 2022

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Malfunction Report

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal strapping manufacturing operation.

Source Address:	4414 E 400 South, Crawfordsville, Indiana 47933
General Source Phone Number:	765-361-0001
SIC Code:	3479 (Coating, Engraving and Allied Services, Not Elsewhere Classified)
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) One dip tank, identified as the SP4 E-coat dip tank, for the application of coating to steel strapping, with a maximum capacity of 6.8 tons per hour steel of strapping, with an electric induction furnace for curing the coating, constructed in 2008. Emissions are controlled by the regeneration thermal oxidizer (RTO).

Under 40 CFR 60, Subpart TT, the dip tank is considered a metal coil coating operation.

One (1) 9,000 cfm regenerative thermal oxidizer, constructed in 2008, identified as RT01, with a 3.0 MMBtu per hour natural gas-fired burner, for control of emissions from the SP4 E-coat dip tank.

- (b) One wax coating operation, identified as SP4Wax, constructed in 2008, with a maximum wax usage of 3.9 gallons per hour, for the coating of steel strapping prior to shipping and uses a compound that is mixed with water and has 100% solids content and no VOCs. Emissions are controlled by a CECO_{AIRE} high-efficiency particulate air (HEPA) filter that was installed in 2010.

Under 40 CFR 60, Subpart TT, the wax coating operation SP4Wax is considered an affected unit.

- (c) One (1) heat treatment process, identified as HT3 oil, for the removal of a corrosion-protective oil coating (oil stripping) utilizing a molten lead bath, with a maximum capacity of 6.8 tons per hour of coated steel coils and 0.012 gallon per ton of steel, heated by a natural gas-fired burner, with a maximum capacity of 1.5 MMBtu per hour, constructed in 2008. Particulate is controlled by an electrostatic precipitator (smog Hog) HEPA filter.

- (d) One (1) heat treat generator, part of the heat treatment process HT3 oil, identified as GEN-HT3, that is utilized to consume oxygen in the heat treat process for the metal strapping. The removal of oxygen controls oxidation of the metal strapping with negligible emissions.
- (e) One (1) electric induction oven, identified as SP4 oil, for the removal of corrosion-protective oil (oil stripping), with a maximum capacity of 6.8 tons per hour of steel strapping and 0.012 gallon per ton of steel, constructed in 2008 and vents to the RTO as a voluntary control.
- (f) One slitter and deburring (technically roll forming) with no particulate emissions from the process operation, utilizes a knife-like cutter to cut metal strap into strips ranging in width between 5/8" and 1 1/4", with a maximum capacity of 6.8 tons per hour of oil coated regular duty and heat treated steel coils, constructed in 2008.
- (g) One (1) ink printing line for the steel strapping, identified as PR-1, consists of 6 printers and is used only for the one hundred feet of jumbo coil for one customer. This limits the ink usage to 1/2 gallon per mont.
- (h) One (1) ink printing line, identified as PR-2, consists of 12 printers and is used to print the grade on the jumbo coil and general coil rewinders. Ink and thinner usage is 3 gallons per week (approximately 2.1 gallons of ink and 0.9 gallons of thinner), 100% VOC content.
- (i) One (1) (Safety Kleen) parts washer, identified as PW-1, uses approximately 76 gallons per quarter (equals 304 gallons per year), 100% is removed for off-site disposal.
- (j) One (1) (NatraKleen) parts washer, identified as PW-2, uses approximately 25 gallons per month and 93% is recovered and disposed of off-site.
- (k) Rust prohibitor for coating coil, identified as RP-1, constructed in 2011, utilizing WD40 and Mineral Spirits to coat coil to prevent rust prior to processing.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M107-31044-00063, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M107-31044-00063 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.

- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One dip tank, identified as the SP4 E-coat dip tank, for the application of coating to steel strapping, with a maximum capacity of 6.8 tons per hour steel of strapping, with an electric induction furnace for curing the coating, constructed in 2008. Emissions are controlled by the regeneration thermal oxidizer (RTO).

Under 40 CFR 60, Subpart TT, the dip tank is considered a metal coil coating operation.

One (1) 9,000 cfm regenerative thermal oxidizer (RTO), constructed in 2008, identified as RT01, with a 3.0 MMBtu per hour natural gas-fired burner, for control of emissions from the SP4 E-coat dip tank.

- (b) One wax coating operation, identified as SP4Wax, constructed in 2008, with a maximum wax usage of 3.9 gallons per hour, for the coating of steel strapping prior to shipping and uses a compound that is mixed with water and has 100% solids content and no VOCs. Emissions are controlled by a CECO_{AIRE} high-efficiency particulate air (HEPA) filter that was installed in 2010.

Under 40 CFR 60, Subpart TT, the wax coating operation SP4Wax is considered an affected unit.

- (c) One (1) heat treatment process, identified as HT3 oil, for the removal of a corrosion-protective oil coating (oil stripping) utilizing a molten lead bath, with a maximum capacity of 6.8 tons per hour of coated steel coils and 0.012 gallon per ton of steel, heated by a natural gas-fired burner, with a maximum capacity of 1.5 MMBtu per hour, constructed in 2008. Particulate is controlled by an electrostatic precipitator (smog Hog) HEPA filter.

- (d) One (1) heat treat generator, part of the heat treatment process HT3 oil, identified as GEN-HT3, that is utilized to consume oxygen in the heat treat process for the metal strapping. The removal of oxygen controls oxidation of the metal strapping with negligible emissions.

- (e) One (1) electric induction oven, identified as SP4 oil, for the removal of corrosion-protective oil (oil stripping), with a maximum capacity of 6.8 tons per hour of steel strapping and 0.012 gallon per ton of steel, constructed in 2008 and vents to the RTO as a voluntary control.

- (f) One slitter and deburring (technically roll forming) with no particulate emissions from the process operation, utilizes a knife-like cutter to cut metal strap into strips ranging in width between 5/8" and 1 1/4", with a maximum capacity of 6.8 tons per hour of oil coated regular duty and heat treated steel coils, constructed in 2008.

- (g) One (1) ink printing line for the steel strapping, identified as PR-1, consists of 6 printers and is used only for the one hundred feet of jumbo coil for one customer. This limits the ink usage to 1/2 gallon per month.

- (h) One (1) ink printing line, identified as PR-2, consists of 12 printers and is used to print the grade on the jumbo coil and general coil rewinders. Ink and thinner usage is 3 gallons per week (approximately 2.1 gallons of ink and 0.9 gallons of thinner), 100% VOC content.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-4]

Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and six-tenth (2.6) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator from the E-coat dip tank.

D.1.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the heat treatment process, identified as HT3 oil, shall not exceed 13.0 pounds per hour when operating at a process weight rate of 11,200 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the induction oven, identified as SP4 oil, shall not exceed 13.0 pounds per hour when operating at a process weight rate of 11,200 pounds per hour.
- (c) The pounds per hour limitation was calculated with the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour;} \\ \text{and } P = \text{process weight rate in tons per hour}$$

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOCs) [326 IAC 8-1-2]

Compliance with Condition D.1.1 shall be determined by either one or both of the following compliance methods:

- (a) The Permittee shall determine volume weighted average of coatings used on a daily basis, pursuant to 326 IAC 8-1-2(a)(7).

This volume weighted average for each of the subdivisions of 326 IAC 8-2-9(d) shall be determined by the following equation:

$$A = \left[\sum_{i=1}^N (C_i) \times U_i \right] / \sum U_i$$

Where:

A = volume weighted average in pounds VOC per gallon less water as applied;

C = VOC content of the coating in pounds VOC per gallon less water as applied; and

U = usage rate of the coating in gallons per day.

- (b) The Permittee shall use a regeneration thermal oxidizer (RTO), pursuant to 326 IAC 8-1-2(a)(2).

Pursuant to 326 IAC 8-1-2(b)(1) and 326 IAC 8-1-2(c), the overall efficiency of the RTO shall be equal to or greater than the equivalent overall efficiency calculated by the following equations:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied. E is calculated as follows:

$$E = L / (1 - L/D)$$

Where: E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

L = Applicable emission limit from this in pounds of VOC per gallon of coating
= 2.6 lbs of VOC/gal (per 326 IAC 8-2-4)

D = Baseline solvent density of VOC in the coating and shall be equal to 7.36 pounds of VOC per gallon of solvent

O = Equivalent overall efficiency of the capture system and control device as a percentage.

$$O = 45.68\%, \text{ when } V \text{ is } 7.4 \text{ lbs VOC/gal solids and } E = 4.02 \text{ lbs VOC/gal solids}$$

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.4, the Permittee shall conduct a performance test to verify compliance with the VOC overall control efficiency for the RTO utilizing methods approved by IDEM. This test shall be repeated once every five (5) years from the date of the most recent valid compliance demonstration. Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

Compliance Monitoring Requirements

D.1.6 RTO Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less than one per fifteen (15) minutes. The output of this system

shall be recorded as a 3-hour average. From the date of issuance of this permit until the stack test results are available, the Permittee shall take appropriate response whenever the 3-hour average temperature of the thermal oxidizer is below 1400°F. A 3-hour average temperature that is below 1400°F is not a deviation from this permit. Section C - Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
- (c) On and after the date the stack test results are available, the Permittee shall take appropriate response whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Section C - Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Section C - Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in condition D.1.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The daily cleanup solvent usage each month.

- (4) The total VOC usage for each day.
- (5) The calculated overall control efficiency of the RTO.
- (b) To document the compliance status with Condition D.1.6, maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test or maintain a record of the reason why the continuous temperature records were not taken. (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.7, maintain daily records of the duct pressure or fan amperage or maintain a record of why the duct pressure or fan amperage were not taken. The Permittee shall include in its daily record when the duct pressure, fan amperage, or process airflow is not taken and the reason for the lack of the reading (e.g. the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - Degreasing

Emissions Unit Description:

- (i) One (1) (Safety Kleen) parts washer, identified as PW-1, uses approximately 76 gallons per quarter (equals 304 gallons per year), 100% is removed for off-site disposal.
- (j) One (1) (NatraKleen) parts washer, identified as PW-2, uses approximately 25 gallons per month and 93% is recovered and disposed of off-site.
- (k) Rust prohibitor for coil coating, identified as RP-1, constructed in 2011, utilizing WD40 and Mineral Spirits to coat coil to prevent rust to processing.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.3 Volatile Organic Compounds (VOCs) [326 IAC 8-2-4]

In order to render 326 IAC 8-2-4 not applicable, the VOC input, including coatings, dilution solvents, and cleaning solvents, to RP-1 shall be less than 15 pounds per day.

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitation contained in Condition D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.3.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC usage for each day; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.2.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One dip tank, identified as the SP4 E-coat dip tank, for the application of coating to steel strapping, with a maximum capacity of 6.8 tons per hour steel of strapping, with an electric induction furnace for curing the coating, constructed in 2008. Emissions are controlled by the regeneration thermal oxidizer (RTO).

Under 40 CFR 60, Subpart TT, the dip tank is considered a metal coil coating operation.

One (1) 9,000 cfm regenerative thermal oxidizer, constructed in 2008, identified as RT01, with a 3.0 MMBtu per hour natural gas-fired burner, for control of emissions from the SP4 E-coat dip tank.

- (b) One wax coating operation, identified as SP4Wax, constructed in 2008, with a maximum wax usage of 3.9 gallons per hour, for the coating of steel strapping prior to shipping and uses a compound that is mixed with water and has 100% solids content and no VOCs. Emissions are controlled by an electrostatic precipitator (smog hog) and a high-efficiency particulate air (HEPA) filter that was installed in 2010.

Under 40 CFR 60, Subpart TT, the wax coating operation SP4Wax is considered an affected unit.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

New Source Performance Standards (NSPS) Requirements: for Metal Coil Coating Operations

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1 apply to the metal coil coating operation except as otherwise specified in 40 CFR Part 60, Subpart TT.

- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all notifications and reports to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

E.1.2 Standards of Performance for Metal Coil Surface Coating Requirements [40 CFR Part 60.460, Subpart TT]

Pursuant to 40 CFR Part 60, Subpart TT, the Permittee shall comply with the provisions of Standards of Performance for Metal Coil Surface Coating Requirements, which are incorporated by reference as 326 IAC 12 for the metal coil coating operation as specified as follows.

- (a) 40 CFR 60.460(a)(b)
(b) 40 CFR 60.461(a)

- (c) 40 CFR 60.462(a)(1)(2)
- (d) 40 CFR 60.463(a)(b)(c)(1)(i)(A)(ii)(iii)(iv)(2)(i)(A)(B)(C)(ii)(iii)(iv)
- (e) 40 CFR 60.464(a)(c)
- (f) 40 CFR 60.465(a)(b)(1)(2)(c)(d)(e)
- (g) 40 CFR 60.466(a)(1)(2)(3)(4)(5)(6)(b)(c)(d)

E.1.3 Testing Requirements [326 IAC 2-8-5(a)(1)(4)] [326 IAC 2-1.1-11]

The Permittee shall perform the stack testing required under NSPS 40 CFR 60, Subpart TT, utilizing methods as approved by the Commissioner to document compliance with Condition E.1.2. These tests shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	DuBose Strapping, Inc.
Address:	4414 E 400 South
City:	Crawfordsville, Indiana 47933
Phone #:	765-361-0001
MSOP #:	M107-31044-00063

I hereby certify that DuBose Strapping, Inc. is:

still in operation.

no longer in operation.

I hereby certify that DuBose Strapping, Inc. is:

in compliance with the requirements of MSOP M107-31044-00063.

not in compliance with the requirements of MSOP M107-31044-00063.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality Compliance and Enforcement Branch

Source Name: DuBose Strapping, Inc.
Source Address: 4414 E 400 South, Crawfordsville, Indiana 47933
MSOP Permit No.: M107-31044-00063
Source/Facility: RP-1
Pollutant: VOC Usage
Limit: Less than 15 pounds per day

Month: _____ Year: _____

Day	Month 1: Daily Usage (lbs/day)	Month 2: Daily Usage (lbs/day)	Month 3: Daily Usage (lbs/day)	Day	Month 1: Daily Usage (lbs/day)	Month 2: Daily Usage (lbs/day)	Month 3: Daily Usage (lbs/day)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				TOTAL			

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FAX NUMBER: (317) 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**MSOP Permit
OFFICE OF AIR QUALITY**

**DuBose Strapping, Inc.
4414 E 400 South
Crawfordsville, IN 47933**

Attachment A

Title 40: Protection of Environment

Part 60 - Standards of Performance for New Stationary Sources

Subpart TT— Standards of Performance for Metal Coil Surface Coating

107-31044-00063

Title 40: Protection of Environment

Subpart TT—Standards of Performance for Metal Coil Surface Coating

Source: 47 FR 49612, Nov. 1, 1982, unless otherwise noted.

§ 60.460 Applicability and designation of affected facility.

(a) The provisions of this subpart apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

(b) This subpart applies to any facility identified in paragraph (a) of this section that commences construction, modification, or reconstruction after January 5, 1981.

§ 60.461 Definitions.

(a) All terms used in this subpart not defined below are given the same meaning as in the Act or in subpart A of this part.

Coating means any organic material that is applied to the surface of metal coil.

Coating application station means that portion of the metal coil surface coating operation where the coating is applied to the surface of the metal coil. Included as part of the coating application station is the flashoff area between the coating application station and the curing oven.

Curing oven means the device that uses heat or radiation to dry or cure the coating applied to the metal coil.

Finish coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the final coating(s) on the surface of the metal coil. Where only a single coating is applied to the metal coil, that coating is considered a finish coat.

Metal coil surface coating operation means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.

Prime coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the initial coating(s) on the surface of the metal coil.

Quench station means that portion of the metal coil surface coating operation where the coated metal coil is cooled, usually by a water spray, after baking or curing.

VOC content means the quantity, in kilograms per liter of coating solids, of volatile organic compounds (VOC's) in a coating.

(b) All symbols used in this subpart not defined below are given the same meaning as in the Act and in subpart A of this part.

C_a = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).

C_b = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).

C_f = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon).

D_c = density of each coating, as received (kilograms per liter).

D_d = density of each VOC-solvent added to coatings (kilograms per liter).

D_r = density of VOC-solvent recovered by an emission control device (kilograms per liter).

E = VOC destruction efficiency of the control device (fraction).

F = the proportion of total VOC's emitted by an affected facility that enters the control device (fraction).

G = volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter).

L_c = the volume of each coating consumed, as received (liters).

L_d = the volume of each VOC-solvent added to coatings (liters).

L_r = the volume of VOC-solvent recovered by an emission control device (liters).

L_s = the volume of coating solids consumed (liters).

M_d = the mass of VOC-solvent added to coatings (kilograms).

M_o = the mass of VOC's in coatings consumed, as received (kilograms).

M_r = the mass of VOC's recovered by an emission control device (kilograms).

N = the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter).

Q_a = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).

Q_b = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).

Q_f = the volumetric flow rate of each gas stream emitted directly to the atmosphere (dry standard cubic meters per hour).

R = the overall VOC emission reduction achieved for an affected facility (fraction).

S = the calculated monthly allowable emission limit (kilograms of VOC per liter of coating solids applied).

V_s = the proportion of solids in each coating, as received (fraction by volume).

W_o = the proportion of VOC's in each coating, as received (fraction by weight).

§ 60.462 Standards for volatile organic compounds.

(a) On and after the date on which §60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than:

(1) 0.28 kilogram VOC per liter (kg VOC/ l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s); or

(2) 0.14 kg VOC/ l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(3) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(4) A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/ l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

§ 60.463 Performance test and compliance provisions.

(a) Section 60.8(d) and (f) do not apply to the performance test.

(b) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.

(c) The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/ l of coating solids applied.

(1) An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under §60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator.

(i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of this section. The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

(A) Calculate the mass of VOC's used ($M_o + M_d$) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{oi} D_{oi} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 1}$$

($\sum L_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received)

where

n is the number of different coatings used during the calendar month, and

m is the number of different VOC solvents added to coatings used during the calendar month.

(B) Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n V_{si} L_{vi} \quad \text{Equation 2}$$

Where:

n is the number of different coatings used during the calendar month.

(C) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \quad \text{Equation 3}$$

(ii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:

$$N = G \quad \text{Equation 4}$$

(iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/ l, the affected facility is in compliance.

(iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/ l of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

(2) An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under §60.462(a) (2) or (3).

(i) Determine the overall reduction efficiency (R) for the capture system and control device.

For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c)(2)(i) (A), (B), and (C) of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.

(A) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^j C_{vi} Q_{vi}}{\sum_{i=1}^j C_{vi} Q_{vi} + \sum_{i=1}^k C_{vi} Q_{vi}}$$

Equation 5

Where:

l is the number of gas streams entering the control device, and

p is the number of gas streams emitted directly to the atmosphere.

(B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^n Q_{in} C_{in} - \sum_{j=1}^m Q_{out} C_{out}}{\sum_{i=1}^n Q_{in} C_{in}}$$

Equation 6

Where:

n is the number of gas streams entering the control device, and

m is the number of gas streams leaving the control device and entering the atmosphere.

The owner or operator of the affected facility shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §60.466. The owner or operator of the affected facility shall construct a temporary enclosure around the coating applicator and flashoff area during the performance test for the purpose of evaluating the capture efficiency of the system. The enclosure must be maintained at a negative pressure to ensure that all VOC emissions are measurable. If a permanent enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is adequately containing VOC emissions, no additional enclosure is required for the performance test.

(C) Determine overall reduction efficiency (R) using the following equation:

$$R = EF \quad \text{Equation 7}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows.

(ii) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section.

(iii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G(1 - R) \quad \text{Equation 8}$$

(iv) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg / l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

(3) An owner or operator shall use the following procedure for each affected facility that uses a control device that recovers the VOC's (e.g., carbon adsorber) to comply with the applicable emission limit specified under §60.462(a)(2) or (3).

(i) Calculate the total mass of VOC's consumed ($M_o + M_d$) during each calendar month for each affected facility using equation (1).

(ii) Calculate the total mass of VOC's recovered (M_r) during each calendar month using the following equation:

$$M_r = L_r D_r \quad \text{Equation 9}$$

(iii) Calculate the overall reduction efficiency of the control device (R) for each calendar month for each affected facility using the following equation:

$$R = \frac{M_r}{M_o + M_d} \quad \text{Equation 10}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) must be computed as follows.

(iv) Calculate the total volume of coating solids consumed (L_s) and the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (B) and (C) of this section.

(v) Calculate the volume-weighted average mass of VOC's emitted to the atmosphere (N) for each calendar month for each affected facility using equation (8).

(vi) If the weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

(4) An owner or operator shall use the following procedures for each affected facility that intermittently uses a capture system and a control device to comply with the emission limit specified in §60.462(a)(4).

(i) Calculate the total volume of coating solids applied without the control device in operation (L_{sn}) during each calendar month for each affected facility using the following equation:

$$L_{sn} = \sum_{i=1}^n V_{si} L_{ci} \quad \text{Equation 11}$$

Where:

n is the number of coatings used during the calendar month without the control device in operation.

(ii) Calculate the total volume of coating solids applied with the control device in operation (L_{sc}) during each calendar month for each affected facility using the following equation:

$$L_{sc} = \sum_{i=1}^n V_{si} L_{ci} \quad \text{Equation 12}$$

Where:

n is the number of coatings used during the calendar month with the control device in operation.

(iii) Calculate the mass of VOC's used without the control device in operation ($M_{on}+M_{dn}$) during each calendar month for each affected facility using the following equation:

$$M_{on} + M_{dn} + \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 13}$$

Where:

n is the number of different coatings used without the control device in operation during the calendar month, and

m is the number of different VOC-solvents added to coatings used without the control device in operation during the calendar month.

(iv) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied without the control device in operation (G_n) during each calendar month for each affected facility using the following equation:

$$G_n = \frac{M_{on} + M_{dn}}{L_{sn}} \quad \text{Equation 14}$$

(v) Calculate the mass of VOC's used with the control device in operation ($M_{oc}+M_{dc}$) during each calendar month for each affected facility using the following equation:

$$M_{oc} + M_{dc} = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 15}$$

Where:

n is the number of different coatings used with the control device in operation during the calendar month, and

m is the number of different VOC-solvents added to coatings used with the control device in operation during the calendar month.

(vi) Calculate the volume-weighted average of the total mass of VOC's used per unit volume of coating solids applied with the control device in operation (G_c) during each calendar month for each affected facility using the following equation:

$$G_c = \frac{M_{oc} + M_{dc}}{L_{sn}} \quad \text{Equation 16}$$

(vii) Determine the overall reduction efficiency (R) for the capture system and control device using the procedures in paragraphs (c)(2)(i) (A), (B), and (C) or paragraphs (c)(3) (i), (ii), and (iii) of this section, whichever is applicable.

(viii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month for each affected facility using the following equation:

$$N = \frac{G_n L_{sn} + G_c L_{sc} (1 - R)}{L_{sn} + L_{sc}} \quad \text{Equation 17}$$

Equation 17

(ix) Calculate the emission limit(s) for each calendar month for each affected facility using the following equation:

$$S = \frac{0.28 L_{sn} + 0.1 G_c L_{sc}}{L_{sn} + L_{sc}}$$

or

$$\frac{0.28 L_{sn} + 0.14 L_{sc}}{L_{sn} + L_{sc}} \quad \text{Equation 18}$$

whichever is greater.

(x) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to the calculated emission limit (S) for the calendar month, the affected facility is in compliance. Each monthly calculation is a performance test.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.464 Monitoring of emissions and operations.

(a) Where compliance with the numerical limit specified in §60.462(a) (1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in §60.463.

(b) Where compliance with the limit specified in §60.462(a)(4) is achieved through the intermittent use of emission control devices, the owner or operator shall compute and record for each affected facility the average VOC content of coatings applied during each calendar month according to the equations provided in §60.463.

(c) If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with §60.462(a)(2), (3), or (4). This device shall have an accuracy of ± 2.5 °C. or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of ± 2.5 °C. or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet

temperature falls more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.465 Reporting and recordkeeping requirements.

(a) Where compliance with the numerical limit specified in §60.462(a) (1), (2), or (4) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of this subpart shall include in the initial compliance report required by §60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with §60.462(a)(4) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation.

(b) Where compliance with §60.462(a)(2), (3), or (4) is achieved through the use of an emission control device that destroys VOC's, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by §60.8:

(1) The overall VOC destruction rate used to attain compliance with §60.462(a)(2), (3), or (4) and the calculated emission limit used to attain compliance with §60.462(a)(4); and

(2) The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with §60.462(a)(2), (3), or (4).

(c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(d) The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.464(c). If no such periods occur, the owner or operator shall state this in the report.

(e) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

[47 FR 49612, Nov. 1, 1982, as amended at 55 FR 51383, Dec. 13, 1990; 56 FR 20497, May 3, 1991; 65 FR 61761, Oct. 17, 2000]

§ 60.466 Test methods and procedures.

(a) The reference methods in appendix A to this part, except as provided under §60.8(b), shall be used to determine compliance with §60.462 as follows:

(1) Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

(2) Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the control device on each stack equipped with an emission control device and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere;

(3) Method 1 for sample and velocity traverses;

(4) Method 2 for velocity and volumetric flow rate;

(5) Method 3 for gas analysis; and

(6) Method 4 for stack gas moisture.

(b) For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

(c) For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(d) The Administrator will approve testing of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks.

[47 FR 49612, Nov. 1, 1982, as amended at 51 FR 22938, June 24, 1986; 65 FR 61761, Oct. 17, 2000]

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a New Source Review and
Minor Source Operating Permit Renewal**

Source Background and Description

Source Name:	DuBose Strapping, Inc.
Source Location:	4414 E 400 South, Crawfordsville, Indiana 47933
County:	Montgomery
SIC Code:	3479 (Coating, Engraving and Allied Services, Not Elsewhere Classified)
Permit Renewal No.:	M107-31044-00063
Permit Reviewer:	Janet Mobley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from DuBose Strapping, Inc. a metal strapping manufacturing operation. On October 18, 2011, DuBose Strapping, Inc. submitted an application to the OAQ requesting to renew its operating permit. DuBose Strapping, Inc. was issued a New Construction MSOP (M107-23528-00063) on February 16, 2007.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One dip tank, identified as the SP4 E-coat dip tank, for the application of coating to steel strapping, with a maximum capacity of 6.8 tons per hour steel of strapping, with an electric induction furnace for curing the coating, constructed in 2008. Emissions are controlled by the regeneration thermal oxidizer (RTO).

Under 40 CFR 60, Subpart TT, the dip tank is considered a metal coil coating operation.

One (1) 9,000 cfm regenerative thermal oxidizer (RTO), constructed in 2008, identified as RT01, with a 3.0 MMBtu per hour natural gas-fired burner, for control of emissions from the SP4 E-coat dip tank.

- (b) One wax coating operation, identified as SP4Wax, constructed in 2008, with a maximum wax usage of 3.9 gallons per hour, for the coating of steel strapping prior to shipping and uses a compound that is mixed with water and has 100% solids content and no VOCs. Emissions are controlled by a CECO_{AIRE} high-efficiency particulate air (HEPA) filter that was installed in 2010.

Under 40 CFR 60, Subpart TT, the wax coating operation SP4Wax is considered an affected unit.

- (c) One (1) heat treatment process, identified as HT3 oil, for the removal of a corrosion-protective oil coating (oil stripping) utilizing a molten lead bath, with a maximum capacity of 6.8 tons per hour of coated steel coils and 0.012 gallon per ton of steel, heated by a natural gas-fired burner, with a maximum capacity of 1.5 MMBtu per hour, constructed in 2008. Particulate is controlled by an electrostatic precipitator (smog Hog) HEPA filter.

Note: 70% of the steel is processed first through the Heat Treat Process and the other 30% is controlled by RT01 at the induction oven. *The use of the RTO to control the induction oven is voluntary and RTO not required by rule.*

- (d) One (1) heat treat generator, part of the heat treatment process HT3 oil, identified as GEN-HT3, that is utilized to consume oxygen in the heat treat process for the metal strapping. The removal of oxygen controls oxidation of the metal strapping with negligible emissions.
- (e) One (1) electric induction oven, identified as SP4 oil, for the removal of corrosion-protective oil (oil stripping), with a maximum capacity of 6.8 tons per hour of steel strapping and 0.012 gallon per ton of steel, constructed in 2008 and vents to the RTO as a voluntary control.

Note: 30% of the oil stripping is controlled by RTO through this induction oven. *The use of the RTO to control the induction oven is voluntary and RTO not required by rule. The source received a Notice Only Change No. (107-29378-00063, issued on July 7, 2010) to vent to the smog hog but reverted back immediately to use the RTO for control.*

- (f) One slitter and deburring (technically roll forming) with no particulate emissions from the process operation, utilizes a knife-like cutter to cut metal strap into strips ranging in width between 5/8" and 1 1/4", with a maximum capacity of 6.8 tons per hour of oil coated regular duty and heat treated steel coils, constructed in 2008.
- (g) One (1) ink printing line for the steel strapping, identified as PR-1, consists of 6 printers and is used only for the one hundred feet of jumbo coil for one customer. This limits the ink usage to 1/2 gallon per month.
- (h) One (1) ink printing line, identified as PR-2, consists of 12 printers and is used to print the grade on the jumbo coil and general coil rewinders. Ink and thinner usage is 3 gallons per week (approximately 2.1 gallons of ink and 0.9 gallons of thinner), 100% VOC content.
- (i) One (1) (Safety Kleen) parts washer, identified as PW-1, uses approximately 76 gallons per quarter (equals 304 gallons per year), 100% is removed for off-site disposal.
- (j) One (1) (NatraKleen) parts washer, identified as PW-2, uses approximately 25 gallons per month and 93% is recovered and disposed of off-site.
- (k) Rust prohibitor for coating coil, identified as RP-1, constructed in 2011, utilizing WD40 and Mineral Spirits to coat coil to prevent rust prior to processing

Note: The rust prohibitor is applied on the Heat Treat Line at the end of the process, generally between the months of March through November. Emissions <1 lb per day based on a test by the facility to estimate the evaporation of the mixture from the coils (evaporation is 10%).

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source added emission units that were constructed and are operating without a permit during this review. These include the parts washers, the ink printing line and rust prohibiting (PR-1, PR-2, PW-1, PW-2 and RP-1) as insignificant activities to this renewal. The addition of these units and

maximum capacity process rates have been updated in this renewal utilizing the coating/usage rates and the tons of strapping produced. The source had a VOC determination and received new MSDS sheet for one of the products they use that was able to verify that they could continue operating as a MSOP.

Emission Units and Pollution Control Equipment Removed From the Source

The source has not removed any emission units during this review.

Existing Approvals

Since the issuance of the MSOP (107-23528-00063) on February 16, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Notice Only Change No. (107-26987-00063) issued on October 15, 2008; and
- (b) Notice Only Change No. (107-29378-00063) issued on July 7, 2010.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit".

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Montgomery County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Montgomery County

has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Montgomery County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Montgomery County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs CO _{2e}	Total HAPs	Worst Single HAP
Dip Tank, SP4 E-coat dip tank	0.00	0.00	0.00	0.00	0.00	54.71	0.00	0.00	0.00	0.00
Wax Coating, SP4Wax	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Heat Treatment Process, HT3 Oil & electric induction oven, SP4 Oil	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	3.86E- 05	3.85E-05
Heat Treatment Process, HT3 Combustion (includes gas generator)	0.01	0.06	0.06	0.00	0.74	0.04	0.63	898.96	0.01	0.01
RTO Combustion	0.02	0.10	0.10	0.01	1.31	0.07	1.10	1,586.40	0.02	0.02
SafetyKleen parts washer (PW-1)	0.00	0.00	0.00	0.00	0.00	1.85	0.00	0.00	0.00	
NatraKleen parts washer (PW-2)	0.17	0.17	0.17	0.00	0.00	2.75	0.00	0.00	0.00	
Ink Printing Line (PR-1) and (PR-2)	0.00	0.00	0.00	0.00	0.00	1.62	0.00	0.00	0.00	
Coil Rust Prohibiting, RP-1	0.54	0.54	0.54	0.00	0.00	23.00	0.00	0.00	0.00	
Slitter and Deburring Operation (a rolled forming/calendaring process)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total PTE of Entire Source	0.75	0.87	0.87	0.01	2.06	84.07	1.73	2,485.35	0.04	0.04
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} .										

PSD Minor Status

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO₂ equivalent emissions (CO_{2e}) per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

New Source Performance Standards (NSPS)

- (a) This metal coil coating operation is still subject to the requirements of New Source Performance Standard for Metal Coil Surface Coating (40 CFR 60.460), Subpart TT, which is incorporated by reference as 326 IAC 12, because the facility commenced construction after January 5, 1981, the applicability date for this rule, and is a metal coil coating operation.

The emission units subject to this rule include the following:

- (1) One dip tank, identified as the SP4 E-coat dip tank, for the application of coating to steel strapping, with a maximum capacity of 5.6 tons per hour steel strapping, with an electric induction furnace for curing the coating, constructed in 2008. Emissions are controlled by the regeneration thermal oxidizer (RTO).
- (2) One wax coating operation, identified as SP4Wax, constructed in 2008, with a maximum wax usage of 3.9 gallons per hour, for the coating of steel strapping prior to shipping, with no control, and uses a compound that is mixed with water and has 100% solids content and no VOCs.
 - (a) 40 CFR 60.460(a)(b)
 - (b) 40 CFR 60.461(a)
 - (c) 40 CFR 60.462(a)(1)(2)
 - (d) 40 CFR 60.463(a)(b)(c)(1)(i)(A)(B)(C)(ii)(iii)(iv)(2)(i)(A)(B)(C)(ii)(iii)(iv)
 - (e) 40 CFR 60.464(a)(c)
 - (f) 40 CFR 60.465(a)(b)(1)(2)(c)(d)(e)
 - (g) 40 CFR 60.466(a)(1)(2)(3)(4)(5)(6)(b)(c)(d)

Testing is required in this NSPS.

Note: This NSPS is an existing applicable requirement.

- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63, Subpart XXXXXX), are not included in the permit because the source is not primarily engaged in any of the nine source categories.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts and Products Surface Coating (40 CFR 63, Subpart MMMM), are not included in this permit because the source is not a major source of HAP. This source has a

potential to emit to less than 10 tons of a single HAP and less than 25 tons of any combination of HAPs.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H), are not included in this renewal, because although this source is an area source of hazardous air pollutants and performs surface coating operations, the source coatings and solvents do not contain any of the "target HAPS" (i.e.), compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

State Rule Applicability - Entire Source

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source, constructed in 2007, is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in the permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the potential fugitive particulate emissions are less than 25 tons per year.

- (h) 326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (i) 326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

SP4 E-coat Dip Tank

- (a) 326 IAC 2-4.1 (Hazardous Air Pollutants)
This operation will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
- (b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The E-coat dip tank is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the coating application is a dip coating process. Therefore, the dip tank is exempt pursuant to 326 IAC 6-3-1(b)(5).
- (c) 326 IAC 8-1-6 (New Facilities; general reduction requirements)
The E-coat dip tank is not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because the facility is subject to 326 IAC 8-2-4 (Coil Coating Operations).
- (d) 326 IAC 8-2-4 (Coil Coating Operations)

Note: This is an existing requirement.

The E-coat dip tank is subject to the provisions of 326 IAC 8-2-4 (Coil Coating Operations) because the operation coats metal strips that come in rolls or coils, was constructed after July 2, 1990, and has actual VOC emissions greater than fifteen (15) pounds per day.

Pursuant to 326 IAC 8-2-4, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and six-tenths (2.6) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

Since the coatings used are not in compliance with the VOC limit of 2.6 pounds of VOC per gallon of coating, excluding water, the facility has been complying with this limit either utilizing daily weighted averaging method or the use of RTO.

- (1) Using Daily Volume weighted average as compliance method, pursuant to 326 IAC 8-1-2(a)(7):

This volume weighted average shall be determined by the following equation:

$$A = [\sum (c) \times U] / \sum U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day

- (2) Using the RTO as compliance method, pursuant to 326 IAC 8-1-2(a)(2):

Pursuant to 326 IAC 8-1-2(b)(1) and 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be equal to or greater than the equivalent overall efficiency calculated by the following equations:

(a) $E = L / (1-L/D)$

Where: E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

L = Applicable emission limit from this in pounds of VOC per gallon of coating
= 2.6 lbs of VOC/gal (per 326 IAC 8-2-4)

D = Baseline solvent density of VOC in the coating and shall be equal to 7.36 pounds of VOC per gallon of solvent.

$$E = 2.6 / (1 - 2.6 / 7.36) = 4.02 \text{ lbs VOC/gallon of coating solids as applied.}$$

(b) $O = \frac{V - E}{V} \times 100$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
= $3.5 + 3.9 = 7.4$ lbs VOC/gal solids as applied
(see Appendix A for details)

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
= 4.02 lbs VOC/gallon of coating solids as applied
(see above calculation)

O = Equivalent overall efficiency of the capture system and control device as a percentage.

$$O = \frac{7.4 - 4.02}{7.4} \times 100 = 45.68\%$$

Wax Coating Operation (SP4Wax)

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The wax coating operation, identified as SP4Wax, for the application of wax coatings to steel strapping, is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because this manufacturing process has a potential to emit of particulate matter less than 0.551 pound per hour. Therefore, the wax coating operation SP4Wax is exempt pursuant to 326 IAC 6-3-1(b)(14).

- (b) 326 IAC 8-2-4 (Coil Coating Operations)
The wax coating operation, identified as SP4Wax, is not subject to the provisions of 326 IAC 8-2-4 (Coil Coating Operations) because the actual VOC emissions are less than fifteen (15) pounds per day.

Heat Treatment Process (HT3) oil

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes),
The heat treatment process, identified as HT3 oil, for the removal of oil coatings from metal coils is subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the heat treatment process HT3 oil shall not exceed 13.0 pounds per hour when operating at a process weight rate of 11,200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) 326 IAC 8-1-6 (New Facilities; general reduction requirements)
The heat treatment process, identified as HT3 oil, constructed in 2007, for the removal of oil coatings from metal coils, are not subject to 326 IAC 8 - 1-6 (New Facilities; general reduction requirements) because the potential to emit VOC from each facility is less than twenty-five (25) tons per year.

RTO and Heat Treat Generator (part of the heat treatment process for the metal strapping (GEN-HT3 Combustion))

- (a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas fired burner for the RTO and the natural gas fired burner, identified as GEN-HT3 Combustion, are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) because the burners are not a source of indirect heating.
- (b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas fired burner, identified as GEN-HT3 Combustion, is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because this unit has a potential to emit particulate matter of less than 0.551 pound per hour. Therefore, natural gas fired burner, identified as GEN-HT3 Combustion, is exempt per 326 IAC 6-3-1(b)(14).
- (c) Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO2 equivalent emissions (CO2e). Therefore, CO2e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO2e per year.

Electric Induction Oven (SP4) oil

- (a) The electric induction oven, identified as SP4 oil, for the removal of oil coatings from metal coils is subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the the induction oven SP4 oil shall not exceed 13.0 pounds per hour when operating at a process weight rate of 11,200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) 326 IAC 8-1-6 (New Facilities; general reduction requirements)
The induction oven, identified as SP4 oil, constructed in 2007, for the removal of oil coatings from metal coils, are not subject to 326 IAC 8-1-6 (New Facilities; general reduction requirements) because the potential to emit VOC is less than twenty-five (25) tons per year.

Slitter and Deburring Operation

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The slitter operation is not subject the the requirements of 326 IAC 6-3-2 because there are not particulate emissions from this process. The operation utilizes a knife-like cutter utilizes a knife-like cutter to cut metal strap into strips ranging in width between 5/8" and 1 1/4".

The deburring operation rolls the strap and there are not particulate emissions from this process. The deburring operation is described as a rolled forming process.

Printing Ink (PR-1 and PR-2)

PR-1 is used only for the one hundred feet of jumbo coil for one customer.

PR-2 is used to print the grade on the jumbo coil and general coil rewinders.

326 IAC 8-5-5 (Graphic Arts Operations)

This rule applies to packaging rotogravure, publication rotogravure, and flexographic printing facilities existing as of November 1, 1980, which have potential VOC emissions of greater than one hundred (100) tons per year, or new facilities after November 1, 1980, located anywhere in the state, with potential emissions of twenty-five (25) tons per year or more VOC. DuBose Strapping, Inc. does not operate a packaging rotogravure, a publication rotogravure, and/or a flexographic printing press. Therefore, 326 IAC 8-5-5 does not apply.

326 IAC 8-1-6

The potential VOC emissions from PR-1 and PR-2 are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

There are no other 326 IAC 8 Rules that are applicable to the printing presses.

Parts Washers (PW-1 and PW-2)

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1(a)(2), the two (2) parts washers, the Safety Kleen parts washer, identified as PW-1, constructed in 2008 and the (NatraKleen) parts washer, identified as PW-2 also constructed in 2008, are subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation) since they are new facilities constructed after January 1, 1980, and perform organic solvent degreasing operations located anywhere in the state. These facilities were constructed in 2008 and are located in Montgomery County.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

The requirements of 326 IAC 8-3-5 apply since they were not existing prior to July 1, 1990 and are not located in the counties of Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties. They are located in Montgomery county. Therefore, the provisions of 326 IAC 8-3-5 are applicable to the degreasing operations at the source.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Coil Rust Prohibitor RP-1

(a) 326 IAC 6-3

The RP-1 is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because this unit has a potential to emit particulate matter of less than 0.551 pound per hour. Therefore, RP-1 is exempt per 326 IAC 6-3-1(b)(14).

326 IAC 8-2-4

WD40 and Mineral Spirits are used to coat the coil to prevent rust prior to processing. The VOC emissions from RP-1 are greater than 15 lbs/day. Therefore, to render 326 IAC 8-2-4 not applicable the VOC emissions from RP-1 are limited to less than 15 lbs/day.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with

the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this source are as follows:

Emission Unit	Control Device	Pollutant	Frequency of Testing
SP4 E-coat dip tank	Regenerative thermal oxidizer (RTO)	VOC	Every 5 years*

* Initial stack test was conducted on December 3-4, 2008, and was in compliance at that time.

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
RTO	Operating Temperature	3 -hour average	average 1487°F	Response Steps
	Duct Pressure or fan amperage	Daily	4.0" water	Response Steps

These monitoring conditions are necessary because the regenerative thermal oxidizer (RT01) for the metal coil coating lines must operate properly to ensure compliance with 326 IAC 8-2-4 (Coil Coating Operations) and 40 CFR 60, Subpart TT.

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 18, 2011, and additional information submitted on February 17 and 22, 2012, April 17 and 18, June 5 and 15, 2012.

Conclusion

The operation of this metal strapping manufacturing operation shall be subject to the conditions of the attached MSOP Renewal No. 107-31044-00063.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Janet Mobley at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emission Calculations
Emissions Summary**

**Company Name: DuBose Strapping, Inc.
Address: 4414 East 400 South, Crawfordsville, Indiana 47993
MSOP Renewal No.: M107-31044-00063
Reviewer: Janet Mobley**

Uncontrolled Potential emissions (tons/year)											
Units	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHG as CO ₂ e	Total HAPs	Single Hap	Worst Single HAP
Dip Tank, SP4 E-coat dip tank	0.00	0.00	0.00	0.00	0.00	54.71	0.00	0.00	0.00	0.00	
Wax Coating, SP4Wax	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Heat Treatment Process, HT3 Oil & SP4 Oil, Oil Stripping	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	3.86E-05		
Heat Treatment Process, HT3 Combustion	0.01	0.06	0.06	0.00	0.74	0.04	0.63	898.96	0.01	0.01	
RTO Burner, RT01, Combustion	0.02	0.10	0.10	0.01	1.31	0.07	1.10	1,586.40	0.02	0.02	
SafetyKleen Parts Washer (PW-1)	0.00	0.00	0.00	0.00	0.00	1.85	0.00	0.00	0.00		
NatraKleen parts Washer (PW-2)	0.17	0.17	0.17	0.00	0.00	2.75	0.00	0.00	0.00		
Ink Printing Lines (PR-1) and (Pr-2)	0.00	0.00	0.00	0.00	0.00	1.62	0.00	0.00	0.50	0.50	Glycol Ethers
Coil Rust Prohibiting	0.54	0.54	0.54	0.00	0.00	23.00	0.00	0.00	0.00		
Deburring Operation (a rolled forming/calendaring process)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total	0.75	0.87	0.87	0.01	2.06	84.07	1.73	2,485.35	0.54	0.54	

Controlled Potential emissions (tons/year)											
Units	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHG as CO ₂ e	Total HAPs	Single Hap	Worst Single HAP
Dip Tank, SP4 E-coat dip tank	0.00	0.00	0.00	0.00	0.00	54.71	0.00	0.00	0.00		
Wax Coating, SP4Wax	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Heat Treatment Process, HT3 Oil & SP4 Oil, Oil Stripping	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00		
Heat Treatment Process, HT3 Combustion	0.01	0.06	0.06	0.00	0.74	0.04	0.63	898.96	0.01		
RTO Burner, RT02, Combustion	0.02	0.10	0.10	0.01	1.31	0.07	1.10	1,586.40	0.02		
SafetyKleen Parts Washer (PW-1)	0.00	0.00	0.00	0.00	0.00	1.85	0.00	0.00	0.00		
NatraKleen parts Washer (PW-2)	0.17	0.17	0.17	0.00	0.00	2.75	0.00	0.00	0.00		
Ink Printing Lines (PR-1) and (Pr-2)	0.00	0.00	0.00	0.00	0.00	1.62	0.00	0.00	0.50	0.50	Glycol Ethers
Coil Rust Prohibiting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Deburring Operation (a rolled forming/calendaring process)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Total	0.21	0.33	0.33	0.01	2.06	61.07	1.73	2,485.35	0.54	0.50	

PM=PM10=PM2.5

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley

E-Coat Dip Tank

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Usage Rate (gal/ton of steel)	Maximum Throughput (tons of steel/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Serif HI-Slip Black Electrocoat Feedstock Code 1285-8051	8.60	29.00%	1.3%	27.7%	1.34%	68.00%	0.71895	6.800	2.41	2.38	11.65	279.51	51.01	0.00	3.50	100%
Serif Blue Polyester Replenish	8.40	32.00%	0.9%	31.1%	0.91%	67.00%	0.03404	6.800	2.64	2.61	0.60	14.51	2.65	0.00	3.90	100%
Dimethylethanolamine	7.39	100.00%	0.0%	100.0%	0.0%	0.00%	0.00478	6.800	7.39	7.39	0.24	5.77	1.05	0.00	0.00	0%

Potential Emissions **12.49 299.79 54.71 0.00**

Material	Density (Lb/Gal)	Usage Rate (gal/ton steel)	Maximum Throughput (tons steel/hour)	Weight % Glycol Ethers	Weight % Triethylamine	Weight % Ethylbenzene	Weight % Formaldehyde	Weight % Xylene	Glycol Ethers Emissions (ton/yr)	Triethylamine Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAPs PTE (ton/year)	Total HAPs Controlled (tons/yr)
Serif HI-Slip Black Electrocoat Feedstock	8.60	0.71895	6.8	0%	0%	0%	0%	0%	0.00	0.00	0.000	0.000	0.00	0.00	0.00
Serif Blue Polyester Replenishment	8.40	0.03404	6.8	0%	0%	0%	0%	0%	0.00	0.00	0.000	0.000	0.00	0.00	0.00
Dimethylethanolamine	7.39	0.00478	6.8	0%	0%	0%	0%	0%	0.00	0.00	0.000	0.000	0.00	0.00	0.00
Totals									0.00	0.00	0.00	0.00	0.00	0.00	0.00

METHODOLOGY

Notes: Transfer efficiency assumed to be 100%. All materials are applied through dip coating
Control device = RTO with a 90.1% overall destruction efficiency, calculated using 90%
Usage Rate = gallons used based on 2011 data (supplied by source) / tons of strapping (49,298,165 (tons produced) - 2,885,753 (that doesn't go through coating) / 2000 lbs/ton)
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum (units/hr)
Potential VOC Pounds per Day = usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum throughput * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = transfer efficiency assumed to be 100%
Potential HAPs (ton/year) = density (lb/gal) * usage rate * maximum throughput (tons steel/hr) * weight % of hap * 8760 (hr/yr) * 1 ton/2000 lbs)
Potential Total HAPs = sum of all HAPs (ton/yr)
Controlled Emissions = Uncontrolled times (1-control efficiency)

**Appendix A: Emissions Calculations
VOC and Particulate
Wax Coating**

**Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley**

SP4 WAX

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Usage Rate (gal/ton of steel)	Maximum Throughput (tons of steel/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Uncontrolled HAPs (tons/yr)
Strapping Wax-Powercron Additive (CA-473)	8.66	0.00%	0.0%	0.0%	0.0%	100.00%	0.00669	6.800	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	0.00

Potential Emissions

0.00 0.00 0.00 0.00

Note: Transfer efficiency assumed to be 100%, all materials are applied through dip coating.

METHODOLOGY

Usage Rate (gal/ton of steel) = Usage(gal/yr) based on 2011 data supplied by source / 24,649 (tons of strapping produced)
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum (units/hr)
Potential VOC Pounds per Day = usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year =usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum throughput * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = transfer efficiency assumed to be 100%.
Potential Total HAPs = sum of all HAPs (ton/yr)
Emmissions controlled by CECE Hepa Filter installed in August 2010

**Appendix A: Emissions Calculations
VOC and Particulate
From HT 3 and SP4 Oil**

Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley

Oil Stripping

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Usage Rate (gal/ton of steel)	Maximum Throughput (tons of steel/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Total HAP Content (lb/gal)	Uncontrolled HAPs (tons/yr)	
Quaker Oil	7.78	0.66%	0.0%	0.7%	0.0%	99.10%	0.01233	6.800	0.05	0.05	0.00	0.10	0.02	0.00	0.05	100%	1.05E-04	3.86E-05	
												0.00	0.10	0.02	0.00				

Potential Emissions

METHODOLOGY

Note: Now vented to the RTO for treatment - 90% control of VOCs. No particulate control. 30% OF THE OIL STRIPPING EMISSIONS ARE CONTROLLED BY RT01.

Source provided the the information for the usage rate (gal/ton of steel) based on 2011 data. Gallons of oil to be removed (gal/coil) / strapping produced (tons/year)

Gallons of oil per year based on Strapping produced in SP4 and HT3 and an oil coating application of 30 mg/sq ft. 49298165 (lbs/yr) strapping/489.54 lbs/ft3 (density of strapping)/0.0028 ft (thickness of strapping)*0.000066 (lb oil applied/ft2) / 7.8 lb oil/gal = 304.32 gallons per year.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum (units/hr)

Potential VOC Pounds per Day = usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year =usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum throughput * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = transfer efficiency assumed to be 100%

Controlled PTE VOC (tons/year) = usage rate (gal/ton of steel) * pounds VOC per gallon of coating * (1-0.9) RTO control / 2000 lbs/ton

PTE of HAPs (tons/year) = usage rate (gal/ton of steel) * throughput (tons/hr) * total HAP content (lb/gal) * 8760 hr/yr * ton/2000 lbs.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley

Heat Treatment Process, unit HT3 Combustion and Heat Treat Generator

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.7	1000	14.9

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.01	0.06	0.06	0.00	0.74	0.04	0.63

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

updated 7/11

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 HAPs Emissions**

Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.564E-05	8.935E-06	5.585E-04	1.340E-02	2.532E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.723E-06	8.191E-06	1.042E-05	2.829E-06	1.564E-05

0.01 Total HAPs

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See next page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Greenhouse Gas Emissions**

Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	894	0.0	0.0
Summed Potential Emissions in tons/yr	894		
CO2e Total in tons/yr	898.96		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley

RTO, unit RT101

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.0	1000	26.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.10	0.10	0.01	1.31	0.07	1.10

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

updated 7/11

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 HAPs Emissions**

Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.759E-05	1.577E-05	9.855E-04	2.365E-02	4.468E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.570E-06	1.445E-05	1.840E-05	4.993E-06	2.759E-05

2.480E-02 Total HAPs

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See next page for Greenhouse Gas calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Greenhouse Gas Emissions

Company Name: DuBose Strapping, Inc.
Address City IN Zip: 4414 East 400 South, Crawfordsville, Indiana 47993
Permit Number: M107-31044-00063
Reviewer: Janet Mobley

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	1,577	0.0	0.0
Summed Potential Emissions in tons/yr	1,577		
CO2e Total in tons/yr	1,586.40		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: DuBose Strapping, Inc.
Address: 4414 East 400 South, Crawfordsville, Indiana 47993
MSOP Renewal No.: M107-31044-00063
Reviewer: Janet Mobley

Parts Washers PW-1 and PW-2

Material	Density (Lb/Gal)	Usage Rate (gal/ton of steel)	Maximum Throughput (tons/hr)	Pounds VOC per gallon of coating	Volume Non-Volatiles (solids) lb/gal	Total HAP Content (lb/gal)	Uncontrolled PTE VOC (tons/yr)	Uncontrolled PM,PM10, PM 2.5 (tons/yr)	Uncontrolled HAPs (tons/yr)
PW-1									
Petroleum Naphtha	6.7	0.0092	6.8	6.7	0.00	0.0	1.85	0.000	0.00
PW-2									
NatraKleen	7.1	0.0141	6.8	6.6	0.41	0.0	2.75	0.172	0.00

METHODOLOGY

Note that 228 gallons of SafetyKleen solvent (Petroleum Naphtha) was added in 2011 and 228 gallons was disposed/recycled offsite by SafetyKleen (PW-1) - This represents 100% recovery, however calculations are based on a 10% loss.

Note that based on Natrakleen (PW-2) disposal in 2010, approximately 93% was recovered which corresponds to a loss of approximately 7%. For calculation purposes, a 10% loss is assumed.

PTE of VOC (tons/year) = gallons used per year (gal/year) / Strapping Produced per year (tons/yr) * max throughput (tons/hr) * lb VOC per gal * 8760 hr/yr * ton/2000 lbs * evaporation rate of 10 percent.

No Controls

PTE of PM,PM10,PM2.5 (tons/year) = gallons oil to be removed (gal/coil) * throughput (coils/hr) * volume non-volatiles (solids lb/gal) * 8760 hr/yr * ton/2000 lbs * evaporation Rate of 10%.

Appendix A: Emission Calculations
Emissions Summary

Company Name: DuBose Strapping, Inc.
Address: 4414 East 400 South, Crawfordsville, Indiana 47993
MSOP Renewal No.: M107-31044-00063
Reviewer: Janet Mobley

Ink Printing Lines (PR-1 and PR-2)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Usage Rate (gal/ton of steel)	Maximum Throughput (tons of steel/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Weight % Glycol Ethers	Glycol Ethers Emissions (tons/year)
Mathews M-615 Offset Ink	11.82	31.00%	0.0%	31.0%	0.0%	52.60%	0.00446	6.800	3.66	3.66	0.11	2.67	0.49	0.00	6.97	100%	27.00%	0.42
Mathews #7 Thinner	7.49	100.00%	0.0%	100.0%	0.0%	0.00%	0.00191	6.800	7.49	7.49	0.10	2.33	0.43	0.00	0.00	90%	17.40%	0.07
Universal #100 - Blue	7.38	79.00%	3.0%	76.0%	2.7%	0.00%	0.00221	6.800	5.76	5.61	0.08	2.02	0.37	0.00	0.00	100%		0.00
Universal Type D Blue	9.0	58.00%	0.0%	58.0%	0.0%	0.00%	0.00221	6.800	5.22	5.22	0.08	1.88	0.34	0.00	0.00	100%		0.00

Potential Emissions

Process is uncontrolled

METHODOLOGY

Usage Rate (gal/ton of steel) - quantity (gal/yr) / strapping produced (tons/yr)

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum (units/hr)

Potential VOC Pounds per Day = usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = usage rate * Pounds of VOC per Gallon coating (lb/gal) * Maximum throughput * (8760 hr/yr) * (1 ton/2000 lbs)

Potential HAPs (ton/year) = density (lb/gal) * usage rate * maximum throughput (tons steel/hr) * weight % of hap * 8760 (hr/yr) * 1 ton/2000 lbs

Potential Total HAPs = sum of all HAPs (ton/yr)

0.37 8.90 1.62 0.00 0.50

Appendix A: Emission Calculations
Emissions Summary

Company Name: DuBose Strapping, Inc.
Address: 4414 East 400 South, Crawfordsville, Indiana 47993
MSOP Renewal No.: M107-31044-00063
Reviewer: Janet Mobley

Coil Rust Prohibitor

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Usage Rate (gal/ton of steel)	Maximum Throughput (tons of steel/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	HAPs
Mineral Spirits	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.06670	6.8	6.58	6.58	2.98	71.62	13.07	0.00	0.00	85%	
WD-40	6.8	73.50%	0.0%	73.5%	0.0%	26.03%	0.06670	6.8	5.00	5.00	2.27	54.40	9.93	0.54	19.20	85%	

Potential Emissions

5.25 126.02 23.00 0.54

Methodology

PTE of VOC (tons/year) = Usage Rate (gal per ton of steel) * max throughput (tons/hr) * lb VOC per gal * 8760 hr/yr * ton/2000 lbs * evaporation rate of 10 percent from wound coils.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Allen Needy
DuBose Strapping, Inc.
4414 E 400 S
Crawfordsville, IN 47933

DATE: August 13, 2012

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
MSOP
107-31044-00063

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 8/13/2012 DuBose Strapping, Inc. 107-31044-00063 (Final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Allen Needy DuBose Strapping, Inc. 4414 E 400 S Crawfordsville IN 47933 (Source CAATS) (CONFIRM DELIVERY)									
2		Crawfordsville City Council and Mayors Office 300 E. Pike St Crawfordsville IN 47933 (Local Official)									
3		Montgomery County Health Department 110 W. South Blvd Suite 100 Crawfordsville IN 47933-3351 (Health Department)									
4		Mr. Robert Ford RR 1, Box 233 New Ross IN 47968 (Affected Party)									
5		Ms. Magie Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)									
6		Montgomery County Commissioner 110 West South Boulevard Crawfordsville IN 47933 (Local Official)									
7		Crawfordsville County Public Library 222 South Washington Street Crawfordsville IN 47933 (Library)									
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15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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